

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**THE UNIVERSITY OF MISSISSIPPI
MEDICAL CENTER**

PLAINTIFF

VS.

CIVIL ACTION NO. 3:19-CV-00459-CWR-LGI

**SPENCER K. SULLIVAN, M.D.;
MISSISSIPPI CENTER FOR
ADVANCED MEDICINE, P.C.,
LINNEA MCMILLAN; and
KATHRYN SUE STEVENS**

DEFENDANTS

MOTION FOR ENTRY OF AGREED FINAL JUDGMENT

The University of Mississippi Medical Center (“UMMC”), Plaintiff herein, moves the Court for the entry of a Final Judgment pursuant to Rule 58(d) of the Federal Rules of Civil Procedure and the parties’ mutual settlement agreement (the “Agreed Settlement Terms”), [ECF 441] and in support thereof, UMMC would show unto the Court the following:

1. On October 18, 2024, the first day of trial, all parties announced to the Court that all claims between and among them had been mutually settled and resolved.
2. Pursuant to the parties’ settlement agreement, the “Agreed Settlement Terms” were presented to the Court and made a part of the record. [ECF 441].
3. Pursuant to Paragraph 6 of the parties’ Agreed Settlement Terms, all parties agreed that the Court would enter an Agreed Final Judgment in favor of UMMC and against Spencer K. Sullivan and the Mississippi Center for Advanced Medicine, P.C. in the amount of \$28,323,336.00.
4. Due to the straightforward nature of this motion, UMMC respectfully requests that it not be required to submit a separate supporting memorandum pursuant to Local Uniform Civil Rule 7(b)(4).

WHEREFORE, UMMC respectfully moves this Court to enter an Agreed Final Judgment in this matter awarding UMMC judgment against Spencer K. Sullivan, M.D. and Mississippi Center for Advance Medicine, P.C. in the amount of \$28,323,336.00, and which also incorporates by reference the parties' Agreed Settlement Terms [ECF 441] with post-judgment interest pursuant to 28 U.S.C. § 1961. UMMC further requests all other relief, general or specific, which the Court deems proper in the premises.

Respectfully submitted, this 24th day of October, 2024.

BY: /s/ Robert V. Greenlee
Robert V. Greenlee, MSB 100638

COUNSEL FOR THE UNIVERSITY
OF MISSISSIPPI MEDICAL CENTER:

Phil B. Abernethy, MSB 1023
Paul N. Davis, MSB 8638
Orlando R. Richmond, Sr., MSB 9885
Benjamin M. Watson, MSB 100078
Robert V. Greenlee, MSB 100638
BUTLER SNOW LLP
1020 Highland Colony Parkway, Suite 1400
Ridgeland, Mississippi 39157
Telephone: (601) 948-5711
Facsimile: (601) 985-4500
phil.abernethy@butlersnow.com
paul.davis@butlersnow.com
orlando.richmond@butlersnow.com
ben.watson@butlersnow.com
robert.greenlee@butlersnow.com

Katelyn R. Ashton (admitted *pro hac vice*)
BUTLER SNOW LLP
6075 Poplar Ave
Suite 500
Memphis, TN 38119
(901) 680-7259 (Telephone)
(901) 680-7201 (Fax)
katelyn.ashton@butlersnow.com

CERTIFICATE OF SERVICE

I Robert V. Greenlee do hereby certify that I have this day filed the above and foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

SO CERTIFIED, this the 24th day of October, 2024.

/s/ Robert V. Greenlee
Robert V. Greenlee, MSB 100638